

Andrew B. Downs, SBN 111435
E-mail:andy.downs@bullivant.com
Linda B. Oliver, SBN 166720
E-mail:linda.oliver@bullivant.com
BULLIVANT HOUSER BAILEY PC
101 Montgomery Street, Suite 2600
San Francisco, CA 94104
Telephone: 415.352.2700
Facsimile: 415.352.2701

Attorneys for Defendant Property & Casualty
Ins. Company of Hartford

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SUZANNE CONNIFF,

Plaintiff,

vs.

PROPERTY & CASUALTY INS. COMPANY
OF HARTFORD; and DOES 1-10 inclusive,

Defendants.

Case No.: 2:21-cv-00995-TLN-DMC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND PRETRIAL
DATES SET IN INITIAL PRETRIAL
SCHEDULING ORDER**

Plaintiff Suzanne Conniff (“Plaintiff”) and Defendant Property & Casualty Company of Hartford (“Defendant”) by and through their respective counsel, hereby stipulate and request the Court to approve their agreement for an extension of the discovery and other pretrial deadlines as follows:

1. On June 4, 2021, the Court issued an Initial Pretrial Scheduling Order which set deadlines for factual discovery and expert disclosures, and the deadlines to file dispositive motions and the joint notice of trial readiness [Dkt. 2].

2. Good cause exists for the parties request due to a mutual calendaring mistake which led to the parties' failure to calendar the deadlines imposed by the court's order. The parties were also engaged in settlement discussions in late 2021, but were unable to reach a mutually agreeable resolution. In addition, one of Hartford's attorneys was very ill in late 2021. Her illness required hospitalization in November 2021 and further hospitalization and surgery in January 2022. She has since completely recovered.

3. The discovery in this case will not be extensive, but will require disclosures of the parties' documents and information, plaintiff's deposition and the deposition of a Hartford witness or two, and may require expert disclosures and depositions and subpoenas to third parties for their documents. The parties are also evaluating whether to file dispositive motions that may resolve all or some of the issues raised.

4. In light of the discovery to be completed and the possible dispositive motions, the parties jointly request that the Court extend the discovery deadlines as proposed below:

<u>Deadline</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Deadline to meet and confer regarding discovery	August 3, 2021	Completed.
Initial disclosures due	August 17, 2021	May 15, 2022
Close of factual discovery	March 3, 2022	September 16, 2022
Expert disclosures due	May 2, 2022	November 15, 2022
Supplemental expert disclosures	June 1, 2022	December 15, 2022
Last day for filing dispositive motions	August 30, 2022	March 15, 2023

5. Accordingly, the parties stipulate and respectfully request that the Court extend the deadlines as proposed, or alternative dates convenient for the Court.

1 DATED: May 13, 2022

2 BULLIVANT HOUSER BAILEY PC

3
4 By /s/ Linda B. Oliver_____
5 Andrew B. Downs
6 Linda B. Oliver

7 Attorneys for Defendant Property & Casualty Ins.
8 Company of Hartford

9 DATED: May 13, 2022

10 THE O'CONNOR LAW FIRM

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12 By /s/ Timothy O'Connor (as authorized on 5/13/22)
13 Timothy O'Connor

14 Attorneys for Plaintiff Suzanne Conniff

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16 **ORDER**

17 After considering the stipulation, IT IS HEREBY ORDERED THAT:

- 18 1. For good cause shown, the stipulation is granted;
19 2. The discovery and pretrial dates are continued as follows:

20 Initial disclosures due: May 16, 2022

21 Close of factual discovery: September 16, 2022

22 Expert disclosures due: November 15, 2022

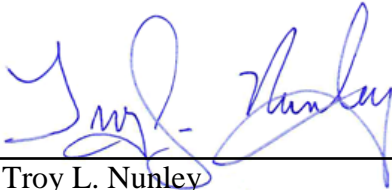
23 Supplemental expert disclosures due: December 15, 2022

24 Last day for filing dispositive motions: March 15, 2023.

25 The parties are ordered to file a Joint Notice of Trial Readiness not later than thirty (30)
26 days after receiving the Court's ruling(s) on the last filed dispositive motion(s). If the parties do
27 not intend to file dispositive motions, the parties are ordered to file a Joint Notice of Trial
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1 Readiness not later than one hundred twenty (120) days after the close of discovery and the
2 notice must include statements of intent to forgo the filing of disposition motions.

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4 DATED: May 13, 2022

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7 Troy L. Nunley
8 United States District Judge
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